

## **EXHIBIT 150**

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE SOUTHERN DISTRICT OF NEW YORK

4 GOVERNMENT OF THE UNITED  
STATES VIRGIN ISLANDS,

Plaintiff,

vs. | Case No.

7 1:22-cv-10904-JSR

UFMORGAN CHASE BANK, N.A.,

Defendant.

10 JPMORGAN CHASE BANK, N.A.,

vs.

JAMES EDWARD STALEY.

14 Third-Party

16

17 Wednesday, April 19, 2023

Videotaped deposition of Phillip DeLuca, held  
20 at the offices of Ulmer & Berne, 65 East State Street,  
Columbus, Ohio, commencing at 9:06 a.m., on the above  
21 date, before Carol A. Kirk, Registered Merit Reporter,  
Certified Shorthand Reporter, and Notary Public.

23 GOLKOW LITIGATION SERVICES  
877.370.DEPS  
24 depsonline@qolkow.com

1 Jeffrey Epstein from the bank?

2 MR. KRAUSE: Objection.

3 You can answer.

4 A. Do I understand -- can you repeat  
5 that, please?

6 Q. Do you know the basis for AML  
7 Investigations' recommendation to exit  
8 Mr. Epstein from the bank?

9 A. I believe it was reputational  
10 risk.

11 Q. Reputational risk based on what?

12 A. Based on a prior conviction.

13 Q. A prior conviction for what?

14 A. Some type of sexual activity.

15 Q. Do you know when relative to  
16 Mr. Epstein's conviction the recommendation to  
17 exit him from the bank was made?

18 A. No, I don't.

19 Q. Do you recall whether AML  
20 Investigations recommended more than once that  
21 Mr. Epstein be exited from the bank?

22 A. I don't recall.

23 Q. Did you speak with Mr. Langford  
24 about the disagreement between Private Bank and

1 I -- I think I read somewhere that they were  
2 interested in him.

3 Q. So why would that make you call?

4 A. I had a -- I spoke with the FBI  
5 daily.

6 Q. Was it to exchange information  
7 with the FBI about Mr. Epstein?

8 MR. KRAUSE: Objection.

9 A. My conversations?

10 Q. The purpose of your call.

11 A. The purpose of my call was  
12 specifically to exchange information.

13 Q. About Mr. Epstein?

14 A. To gather information on what  
15 their investigation was.

16 Q. Did you ever provide information  
17 to the FBI about Mr. Epstein?

18 A. Like? Not that I recall.

19 Q. Did you ever speak with an FBI  
20 agent about Mr. Epstein?

21 A. An agent?

22 Q. Anybody at the FBI.

23 A. Oh, yes, I did.

24 Q. Okay. Who did you speak with at

1 the FBI?

2 A. His name is Tim Moyer.

3 Q. Okay. And what did you tell

4 Mr. Moyer in your call?

5 A. I asked Mr. Moyer to provide me  
6 with the contact in the FBI who may have been  
7 working the Epstein matter.

8 Q. Did he confirm that the FBI -- did  
9 Mr. Moyer confirm that the FBI was looking at  
10 Epstein?

11 A. He indicated to me, "Let me get  
12 back to you."

13 Q. About whether the FBI was looking  
14 at Mr. Epstein?

15 MR. KRAUSE: Objection.

16 A. I -- that's what I took it to  
17 mean.

18 Q. Did you share any information  
19 about Mr. Epstein with Mr. Moyer when you spoke  
20 with him?

21 A. Not that I recall.

22 Q. Did you send him any information  
23 about Mr. Epstein?

24 A. Not that I recall.

A 20x20 grid of black bars of varying lengths, representing a sparse matrix. The bars are arranged in a grid pattern, with each row and column containing a series of black bars. The lengths of the bars vary, indicating non-zero elements in a sparse matrix. The grid is composed of 20 horizontal rows and 20 vertical columns, with each cell containing a series of bars. The bars are black and have varying lengths, representing the magnitude of the non-zero elements in the matrix. The grid is centered in the image, with the bars extending from the center point.

The figure consists of a 20x20 grid of black bars on a white background. The bars are arranged in a pattern where most rows have a single bar, while several rows have two bars. The rows with two bars are located at various positions, including the top, middle, and bottom of the grid. The bars are of uniform width and height, and they are positioned such that they do not overlap.

1 Lenny Gail. I represent JPMorgan. A few  
2 clarifying questions, and we'll get you out of  
3 here.

4 A. Okay.

5 Q. You testified about a call you  
6 made to the FBI earlier today.

7 Do you recall that?

8 A. I do.

9 Q. Before you made that call, had you  
10 seen news stories relating to Jeffrey Epstein?

11 A. I think so.

12 Q. Remind us again the name of the  
13 person you contacted.

14 A. His name was Tim Moyer.

15 Q. Why did you reach out to Mr. Moyer  
16 at that time about Epstein?

17 A. I met with the FBI on a monthly  
18 basis at that point in time, and I recall  
19 reading somewhere that the FBI was -- initiated  
20 an investigation, and I was looking for the  
21 contact that I could talk to.

22 Q. What did you ask Mr. Moyer?

23 A. I asked Tim for a contact that  
24 I could talk to.

1 Q. What did he say in response?

2 A. "I'll get back to you."

3 Q. Do you recall anything else?

4 A. Pardon?

5 Q. Do you recall anything else about  
6 the call?

7 A. No.

8 Q. How was it left?

9 A. That he would get back to me.

10 Q. So did you ever hear back from  
11 Mr. Moyer?

12 A. About that? No.

13 Q. Did you ever hear back from anyone  
14 else at the FBI, whether an investigator, an  
15 agent, or otherwise?

16 A. No.

17 Q. Given your consistent dealings  
18 with law enforcement, how did you interpret the  
19 fact that the FBI never got back to you about  
20 Epstein?

21 A. That they weren't interested.

22 Q. Okay. One more topic, and then  
23 we'll be done.

24

